

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARMIN HARCEVIC

Defendant.

**Cause No. 4:15-CR-0049 CDP- DDN**

**MOTION TO ALLOW FOR SPECIAL APPEARANCE, OR IN THE ALTERNATIVE, TO  
CONTINUE THE STATUS CONFERENCE DATE**

Comes now attorney Linda Moreno, and hereby requests this Court allow for my special appearance, without pro hac vice application or fees, at the Status Conference Hearing now re-set for Thursday, August 18, 2016, at 2:00 p.m. Both Mr. Swift and Ms. McDonald, defendant Armin Harcevic's attorneys of record, will be out of the country the week of August 15 on a previously scheduled, non-refundable vacation, will not have access to cell phone coverage, and will not be able to call into the hearing on August 18. I ask the Court to allow me in my capacity as Of Counsel to the Constitutional Law Center for Muslims in America, to enter a special appearance without fees or need for pro hac application, and appear by phone for the purposes of this hearing only, and represent Mr. Harcevic on their behalf. I will be briefed by attorneys McDonald and Swift as to issues on this case and issues which may arise at this hearing.

I am an experienced criminal defense attorney specializing in National Security cases, licensed to practice in both California and Florida, and admitted to practice in numerous Federal

District Courts around the country. (Attached as Exhibit 1 - very recent Certificates of Good Standing.) I am not licensed to practice in Missouri, nor admitted in the Eastern District of Missouri Federal District Court.

In the alternative, should the court not grant my request for my special appearance for this hearing only, defendant Armin Harcevic would request that the court re-schedule the Status Conference Hearing to any day during the weeks of August 8, August 22, or August 29, when both counsel, Charles Swift and Catherine McDonald, would be available to participate.

WHEREFORE, for the foregoing reasons I request this Court enter an order allowing for my special appearance.

Dated this 21<sup>st</sup> day of June, 2016

/s/ *Linda Moreno*

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of defendant Harcevic's Motion to Allow for Special Appearance or Rescheduling of the Status Conference Hearing was electronically filed and served on the Court's electronic filing system:

DATED this 21<sup>st</sup> day of June, 2016.

/s/ Charles D. Swift

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